

1  
2  
3  
4  
5  
6  
7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 ARTHUR RONESS, )  
11 Plaintiff, ) No. C18-1030 RSM  
12 vs. ) STIPULATED MOTION AND ORDER TO  
13 T-MOBILE USA, INC., a Delaware corporation, ) EXTEND DISCOVERY DEADLINE RE  
14 Defendant. ) DEPOSITION OF BROADSPIRE  
15 ) REPRESENTATIVE  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )

24 COMES NOW, Plaintiff Arthur Roness and Defendant T-Mobile USA, Inc., by and  
25 through their respective counsel of record, hereby move pursuant to Federal Rules of Civil  
26 Procedure 6(b) and Local Civil Rule 7(j) for relief from the discovery deadline for the limited  
27 purpose of: (1) taking the Rule 30(b)(6) deposition of Broadspire Services, Inc.'s ("BSI")  
28 representative; and (2) allowing T-Mobile to answer interrogatory questions in lieu of undergoing  
29 a Rule 30(b)(6) deposition.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23

On June 5, 2019, BSI was served with subpoena for its continued deposition, which was scheduled for June 25, 2019. However, because BSI's Rule 30(b)(6) representative's schedule and defense counsel's unavailability, the deposition could not be rescheduled before the current discovery cut-off date of July 1, 2019. The parties hereby stipulate, agree and request that the Court grant an extension of the discovery deadline to allow the parties to complete BSI's deposition, which is currently scheduled for July 8, 2019.

STIPULATED MOTION AND AGREED ORDER TO EXTEND  
DISCOVERY DEADLINE  
(No. 2:18-cv-01030-RSM) - 2

1 ///

2 DATED THIS 25<sup>th</sup> day of June 2019.

3 SEBRIS BUSTO JAMES

PREMIER LAW GROUP, PLLC

4 BY: /s/ Jeffrey A. James

/s/ Patrick J. Kang

5 **Jeffrey A. James**, WSBA #18277

**Patrick J. Kang**, WSBA #30726

6 **Matthew R. Kelly**, WSBA #48050

1408 140<sup>th</sup> PL NE

14205 SE 36<sup>th</sup> Street, Suite 325

Bellevue, WA 98007

Bellevue, WA 98006

Tel. (206) 285-1743

7 Tel. (425) 454-4233

Fac. (206) 599-6316

8 [jaj@sebrisbusto.com](mailto:jaj@sebrisbusto.com)

[patrick@premierlawgroup.com](mailto:patrick@premierlawgroup.com)

9 [mkelly@sebrisbusto.com](mailto:mkelly@sebrisbusto.com)

Attorney for Plaintiff

Attorneys for Defendant

1 **ORDER**

2 **PURSUANT TO THE PARTIES' STIPULATION IT IS SO ORDERED**

3 IT IS FURTHER ORDERED that pursuant to LCR 7(j), the discovery deadline in this  
4 matter shall be extended so that: (1) the parties may take the deposition of BSI's 30(b)(6)  
5 representative; and (2) T-Mobile can answer specific written questions in accordance with Rule  
6 33 in lieu of appearing for a Rule 30(b)(6) deposition.

7 DATED this 27<sup>th</sup> day of June 2019.

8 

9 **RICARDO S. MARTINEZ**  
10 **CHIEF UNITED STATES DISTRICT JUDGE**